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### R E M A R K S

Claims 1-16 were rejected, claims 27-29 were objected to, and claims 30-34 were allowed. Claim 27 is amended to overcome the objection to claims 27-29.

Claims 1-6, 12-14, and 26 were rejected under 35 USC 103 as being unpatentable over Belkin et al, US patent 6,542,920 in view of IBM Technical Disclosure Bulletin titled "Single System Image and Load Balancing for Network Access to a Loosely Coupled Complex." Claim 1 is amended to overcome the rejection.

Belkin et al disclose a computer system with multiple thread pools, with each thread pool comprising one or more threads. Each thread pool has a set of associated characteristics, and the characteristics of each thread pool are customized for one or more particular types of service. After the thread pools have been allocated, the system receives one or more requests. When a request is received, it is processed to determine with which thread pool the request is to be associated. This arrangement purportedly overcomes one of the problems in the prior art where a single pool of threads is used by permitting lightweight service requests to be directed to a pool that has a large number of threads with each thread having a small stack, while directing heavyweight service requests to a pool containing a small number of threads with each thread having a large stack. By thus directing the processing business to different pools of threads, the overall system operation is improved.

From this description it is clear that the pools of threads comprise modules that are optimized to execute operational requests. There is no teaching of any threads that are present effectively solely for mediation between processes that execute the operational requests and the resources of the system, and there is no description of mediation services that operate pursuant to a security policy, or schema. In contradistinction, amended claim 1 specifies a plurality of processing stacks for creating both a protected portion of the system's operating environment. The Belkin et al thread pools do not create a protected portion, and an unprotected portion, and certainly no an arrangement where there is a protected portion of the operating environment and an unprotected portion of the operating environment. Defining the notion more particularly, amended claim 1 specifies that the protected portion protects against interloping processes in accord with an administratively specified schema. No notion of protection is

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present in Belkin et al. Further, amended claim 1 specifies that the processing stacks are such that they interpose themselves between processes and the system resources, by mediating interactions between processes within the system and the resources. Further still, amended claim 1 specifies that when a request is made by a process that is to be applied to a resource the processing stacks create a signal that is applied to the resource, but only if, and in a manner, that is appropriate pursuant to the security schema.

The pools of threads of Belkin et al, therefore, do not correspond to the plurality of processing stacks defined in amended claim 1.

The IBM reference is cited by the Examiner for its alleged teachings of a service director that interprets the requests. Assuming that the reference teaches that which the Examiner asserts it teaches, it leaves the combination of Belkin et al and the IBM reference lacking, in that there is no suggestion of a plurality of stacks that perform the function of the defined in amended claim 1. Therefore, it is respectfully submitted that claim 1 is not obvious in view of the cited references. It follows that the remaining claims that were rejected in view of the combination of Belkin et al and the IBM reference but which depend on claim 1 (that is, claims 2-6, 12-14, and 26) are also not obvious in view of the combination of Belkin et al and the IBM reference

Claims 7-11, 19, and 23-25 were rejected under 35 USC 103 as being unpatentable over Belkin et al in view of the IBM reference and further in view of Mueller et al, US Patent 6,351,816. Applicants respectfully submit that, at least in view of the amendment to claim 1, claims 7-11, 19, and 23-25 are not obvious in view of the cited combination of references. The Mueller et al reference does not teach a plurality of stacks, and does not teach the notion of creating both protected and unprotected portions of a system's operating environment. Therefore, it is respectfully submitted that the Mueller et al reference does not provide that which is missing in the combination of the Belkin et al and the IBM reference. Consequently, it is respectfully submitted that claims 7-11, and 23-25, which depend on amended claim 1, are not obvious in view of the Belkin et al, the IBM article and Mueller et al combination of references.

Claims 15-18 were rejected under 35 USC 103 as being unpatentable over Belkin et al in view of the IBM reference and further in view of Remer et al, US patent 6,598,083. The remarks above relating to the Mueller et al reference apply to the Remer

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et al reference with equal force. Therefore, it is respectfully submitted that the Remer et al reference does not provide that which is missing in the combination of the Belkin et al and the IBM reference and, consequently, claims 15-18, which depend on amended claim 1, are not obvious in view of the Belkin et al, the IBM article and Remer et al combination of references.

Claims 20-22 were rejected under 35 USC 103 as being unpatentable over Belkin et al in view of the IBM reference, in view of Remer et al, and in view of Mueller et al. Applicants respectfully submit that the above remarks relative to Mueller et al and Remer et al apply to claims 20-22, rendering the claims not obvious in view of the Belkin et al, the IBM article, Mueller et al, and Remer et al combination of references.

In light of the above amendments and remarks, applicants respectfully submit that all of the Examiner's objections and rejections have been overcome. Reconsideration and allowance of the outstanding claims are respectfully solicited.

Respectfully,  
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